

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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UNITED STATES OF AMERICA	§	
	§	
	§	Case No. 4:18-CR-00368
v.	§	
	§	
	§	
RONNIE MCADA, JR.	§	

**DEFENDANT RONNIE MCADA, JR.’S UNOPPOSED  
MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant Ronnie McAda, Jr. (“Mr. McAda”) files this Unopposed Motion to Modify Conditions of Release. In support thereof, Mr. McAda states as follows:

1. On October 29, 2019, the Court entered its Order Setting Conditions of Release (“Conditions of Release”) placing various pretrial release restrictions on Mr. McAda. The conditions restrict Mr. McAda’s travel to the state of Texas.

2. Since then, Mr. McAda has been on pretrial release without incident. After a six-week trial in 2022, the Court declared a mistrial on December 13, 2022. Mr. McAda remains released under his original Conditions of Release.

3. Mr. McAda requests that the Court modify his Conditions of Release to include travel throughout the United States without restriction. Mr. McAda’s daughter is a talented high-school basketball player. Her basketball career requires travel throughout the United States to attend tournaments where college scouts are present. This summer, she has at least three events in Arkansas, Kentucky, and Pennsylvania, starting as early as June 23, 2023. Rather than burden the Court with repeated travel requests, Mr. McAda seeks to modify his release conditions to travel within the United States.

4. There are sufficient grounds to grant this motion. Mr. McAda has resided in Texas for the majority of his life, with the exception of attending four years at the United States Military Academy at West Point. He now resides in Texas with his wife and three children. Mr. McAda and his family also have significant ties to the community, including his family home and his children attend school in Sunnyvale and Dallas, Texas. Given that Mr. McAda is a United States citizen, a lifelong Texas resident, and has strong family, community, and professional ties to Texas, there is no incentive for him to flee the jurisdiction of the Court or reason to believe that he would. Mr. McAda has already surrendered his passport pursuant to this Court's order.

5. On June 6, 2023, counsel conferred with Counsel for the government, Dan Griffin, who indicated the government is unopposed to this motion.

Accordingly, defendant Ronnie McAda, Jr. respectfully requests that the Court modify his Conditions of Release to include travel throughout the United States.

Dated: June 6, 2023

Respectfully submitted,

By: /s/ Jeff Ansley

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**ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF CONFERENCE**

I certify that on June 6, 2023 counsel for the Defendant conferred with counsel for the government, Dan Griffin, regarding this motion. Mr. Griffin advised that the government does not oppose the requested relief.

/s/ Arianna Goodman  
Arianna G. Goodman

**CERTIFICATE OF SERVICE**

I certify that on June 6, 2023, I electronically transmitted the foregoing document to the Clerk for the U.S District Court, Southern District of Texas, using the ECF system of the Court.

/s/ Jeff Ansley  
Jeffrey J. Ansley